

**IN THE UNITED STATES DISTRICT
COURT FOR THE WESTERN DISTRICT
OF MISSOURI**

TERI DEAN,)	
)	
Plaintiff,)	Cause No. 5:19-cv-06022
)	
)	
)	
EDWARD BEARDEN,)	
ELIJAH L. MOSIER,)	
TODD E. MUSTAIN,)	
KEVIN L. REED,)	
All named individuals in their Individual)	
Capacities, and)	
ANNE L. PRECYTHE,)	
Director of the Missouri Department)	
of Corrections, in her Individual and)	
Official Capacities,)	
)	
Defendants.)	

**AGREED MOTION TO EXTEND DEFENDANTS' TIME TO
RESPOND TO PLAINTIFF'S FIRST AMENDED COMPLAINT**

Defendants Edward Bearden, Elijah L. Mosier, Todd E. Mustain, Kevin L. Reed, and Anne L. Precythe (collectively "Defendants"), through their undersigned counsel, and by agreement of all parties, hereby move the Court to extend their time to respond under Rule 12 of the Federal Rules of Civil Procedure to the First Amended Complaint of plaintiff Teri Dean through and including August 1, 2019. In support of this motion, Defendants state as follows.

1. Defendants jointly move for an extension of the time to respond to Plaintiff's complaint under Rule 12 of the Federal Rules of Civil Procedure through and including August 1, 2019. Plaintiff's counsel has agreed to the requested extension and Defendant Reed's counsel Rachel M. Rivers has been given authority by counsel for the remaining defendants to file this motion on their behalf.

2. As the Court knows, the Department of Justice has advised the parties that it is still investigating the allegations in this case.

are analyzing the implications of an ongoing federal criminal investigation on the substance of any answer they may file, including, among other things, Fifth Amendment considerations that may impact any answer.

4. Counsel for these individual defendants require additional time to complete their analysis and consult with their clients regarding how to proceed in responding to the First Amended Complaint.

5. Granting this motion will not result in any unfair prejudice to any party, nor will it unduly delay these proceedings.

WHEREFORE, Defendants respectfully request that the Court grant this motion and enter an order extending their time to respond under Rule 12 to the First Amended Complaint through and including August 1, 2019, and such other and further relief as this Court deems just and proper.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that on July 10, 2019, the foregoing was filed with the court's ECF system and electronically served on all counsel of record.

/s/ Rachel M. Rivers

Rachel M. Rivers
Assistant Attorney General